

## More concerns 2/28/00

<u>Source</u>	<u>Comment</u>
CWM p.9	Why are some loads exempted and not subjected to sampling and comparison to the approved characterization data?
LOOW report 1/12/00 meeting p. 2	<p>3. Question by Waiter Polka - Was the carbon tetrachloride the most dangerous substance that you found? There were six drum of carbon tetrachloride wastewater and 50 tons of carbon tetrachloride sludge.</p> <p>4. Question by Gary Smith - How high were the PCB concentrations? Over 50ppm, it was classified as PCB contaminated waste because it exceeded the 50ppm regulatory limit.</p> <p>5. Question by Nona McQuay - Where were the PCBs found, were they closest to the Wastewater Treatment Plant? We typically found PCBs in pockets of liquid in the pipe. It was pretty sporadic. There was one area in particular where we got it. The carbon-tetrachloride and the chloroform came from the Chemical Waste Sewer line.'</p> <p>6. Question by Nona McQuay - In the 2,200 feet remaining, do you expect to find PCBs? We will go in with no presumptions, we will assume that it is there. In the Chemical Waste Sewer line it is reasonable to expect to find it.</p> <p>7. Question by Nona McQuay- Are the excavations that are done closed and remediated? Yes, most of the work was done on the Chemical Waste Management property.</p>
CWM p.24	<b>Regulated radioactive wastes from the Manhattan Project, currently being stored on adjacent property, are not permitted to be placed into hazardous waste (RCRA) landfills.<sup>2</sup> Question - What regulation applies to radioactive wastes found on CWM property?</b>
CWM p.25	<b>Question - What is the reasoning for the reduction in the buffer zone from its 800 foot setback to be reduced to a 300 foot setback?</b>

<sup>1</sup> carbon tetrachloride - a colorless nonflammable toxic liquid CCl<sub>4</sub> that has an odor resembling that of chloroform and is used as a solvent and a refrigerant.

chloroform - a colorless volatile heavy toxic liquid CHCl<sub>3</sub> with an ether odor used esp. as a solvent or as a veterinary anesthetic.

<sup>2</sup> RCRA - Resource Conservation & Recovery Act

## Source

## Comment

CWM p. 32

"At present, while all of the areas of concern for potential environmental impact associated with previous government activity have not been thoroughly investigated, they have been identified and documented. Most recently, in 1999, the USACOE conducted a removal/clean out activity for a portion of the underground lines on the CWM property. Plans are in place for continuation of this work in the future."

CWM p. 34

"The report states that although some areas of contamination were found in the shallow upper tills soil unit, it was concluded that the sources of contamination were related to past surface activities, primarily due to previous historical use of the property by the U.S. Government, and not due to landfill leaks. CWM has installed, and is operating, groundwater interceptor/collection systems at locations where groundwater has been affected to prevent off site migration. " **Question - Who is taking responsibility for past mistakes?**

Draft CWM  
p- 3-6

"The Western Area is partially developed, it is a former military site, with numerous abandoned buildings and structures. "

LOOW Final  
SEQRA 5 - 10

**"The former LOOW buildings are still in existence, are in disrepair & contain asbestos containing materials. However, the buildings are not eligible for demolition or removal under HTRW<sup>3</sup> contract.**

LOOW report  
1/12/00 p.2

44. Question by Kent Johnson (NYSDEC) Why are you able to undertake asbestos abatement at Niagara Falls Storage Site, but not LOOW. Answer Judy Leithner - **Since the Niagara Falls Storage Site property is owned by the Federal Government, we can remediate asbestos, chemical, and radioactive waste.** Note: Most of the former Lake Ontario Ordnance Works is privately owned and being investigated under the DERP-FUDS<sup>4</sup> program. Asbestos<sup>5</sup> is traditionally exempt under DERP-FUDS, although there was an exception made at the Somerset property.

<sup>3</sup> HTRW - Hazardous, Toxic, and Radiological Waste

<sup>4</sup> DERP-FUDS - Defense Environmental Restoration Program for Formerly Used Defense Sites

<sup>5</sup> asbestos - mineral supposed to be inextinguishable when set on fire. A chemical resistant material.